



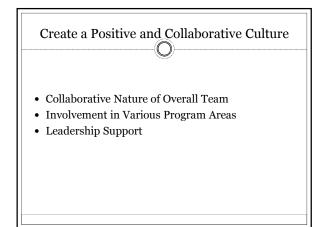
- Centralized
- $\,\circ\,$ One Privacy Office handles all privacy needs of a gency
- Decentralized
- Each major agency component has Privacy Office
 Work up through a Department-Level Office
- Know which you're working with

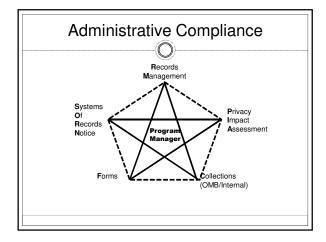
Considerations

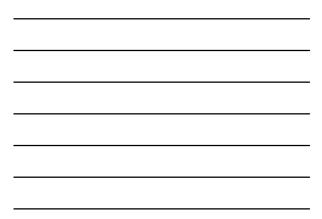
- Determine your area of responsibility
 - Organizationally
 - Personnel (what are the numbers)
- Priorities
 - Look to authorities and guidance
- Staffing
- Professional development (yours)
- PBWA (Privacy By Walking Around)
- Communication with organizational POCs

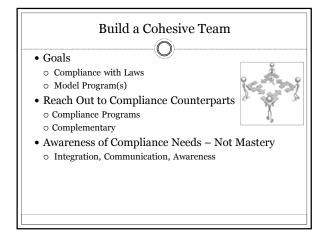
Authorities and Guidance

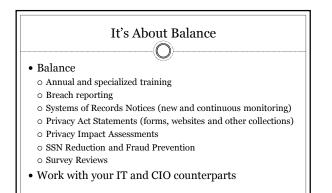
- Federal Records Act
- Paperwork Reduction Act
- Privacy Act of 1974
- E-Government Act of 2002 (OMB Memo M-03-22)
- E.O. 13402, Strengthening Federal Efforts to Protect Against Identity Theft
- $\circ\,$ OMB Memo M-17-12, Preparing for and Responding to a Breach of Personally Identifiable Information
- OMB Memo M-19-02, Fiscal Year 2018-2019 Guidance on Federal Information Security and Privacy Management Requirements

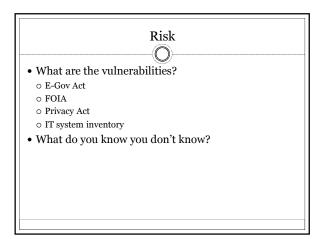


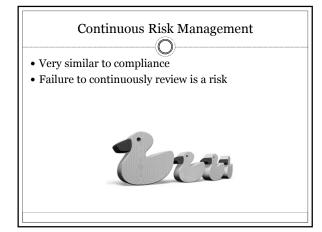


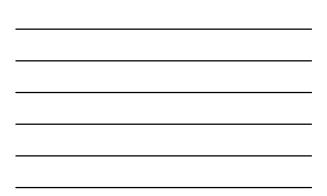


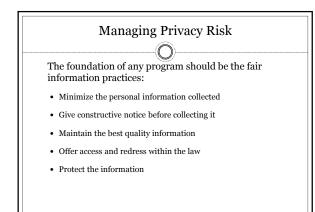








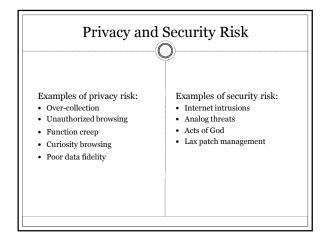


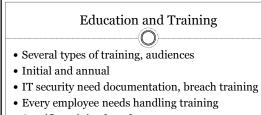


Managing Security Risk

A great security program is no substitute for an effective privacy program.

- A system can be air tight and locked down effectively operating at "zero" security risk
- But it may have already violated fair information practices about minimization, notice, access, and redress, not to mention Federal privacy laws
- "Protect" alone is not enough





- · Specific training based on your agency
 - Intelligence
 - $\,\circ\,$ Law Enforcement
 - \circ Information Sharing Environment (ISE)

Helpful Considerations

- \bigcirc • Understand your legal and regulatory requirements
- · Ask open-ended questions
- Embrace learning as an occupational necessity
- · Frequent assessment is critical to success
- Seek feedback and be open to change
- Network (other privacy folks, program managers, etc.)
 Review policies-are they appropriate or is it just what has always been done?
- Know your priorities but be flexible
- Do not assume someone else is doing it
- · Don't expect to resolve things immediately
- Don't get comfortable
- · The buck stops with you



- Define value
- Keep boss out of the Washington Post (it only takes one negative to prove a positive)
- Ensure operational components can complete their mission within the bounds of the law
- Metrics (Counting)
- How many PASs, PIAs, SORNs?
 How many policies issued?
- o How many PII incidents resolved?
- How many people trained?
- Know that sometimes success is looks bad

